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August 28, 2014

BY ECF

Honorable Thomas P. Griesa
United States District Court for
the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Marie Laurette Dussault v. Republic of Argentina*, No. 06 Civ. 13085 (TPG)

Dear Judge Griesa:

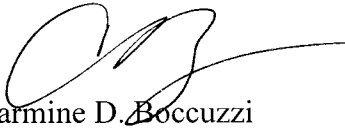
I write in response to plaintiff's August 18, 2014 letter in the above-captioned action, which asks the Court to grant her motion for a *pari passu* injunction or her request that a briefing schedule be set. Unlike the pre-judgment actions in which the Court has entered *pari passu* injunctions or established briefing schedules, the plaintiff here, whose bonds are governed by English law, has already reduced her claim to judgment and is barred by, *inter alia*, the doctrines of *res judicata* and merger from belatedly bringing a *pari passu* claim.

The Court has quite rightly held that it would defer consideration of "me-too" motions to avoid a flood of additional claims at this juncture. The Republic of Argentina (the "Republic") believes the same reasoning applies with even greater force here, where plaintiff raises new issues of substantive law. If, however, the Court would prefer to receive briefing on

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plaintiff's motion now, the Republic respectfully requests that its opposition to plaintiff's motion be due on September 26, 2014.

Respectfully submitted,



Carmine D. Boccuzzi

cc: Counsel of Record (by email)